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Presentment Date: November 18, 2020 12:00 PM
Objection Date: November 11, 2020

Attorneys for Defendants

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC,

Plaintiff,

v.

KUNTZMAN FAMILY LLC; JACQUELINE
D. GREEN, in her capacity as a Managing
Member of the Kuntzman Family L.L.C. and as
Trustee of the Irrevocable Trust FBO Jennifer
Gattegno and the Irrevocable Trust FBO Ethan
Siegel, both members of the Kuntzman Family
L.L.C.; WAYNE D. GREEN, in his capacity as
a Managing Member of the Kuntzman Family
L.L.C.; JUDITH GATTEGNO, in her capacity
as a Member of the Kuntzman Family L.L.C.;
IRREVOCABLE TRUST FBO JENNIFER
GATTEGNO, in its capacity as a Member of
the Kuntzman Family L.L.C.; and

SIPA LIQUIDATION

Adv. Pro. No. 08-01789 (SMB)
(Substantively Consolidated)

Adv. Pro. No. 10-04752 (SMB)

IRREVOCABLE TRUST FBO ETHAN
SIEGEL, in its capacity as a Member of the
Kuntzman Family L.L.C.,

Defendants.

NOTICE OF PRESENTMENT OF AN ORDER
GRANTING APPLICATION TO WITHDRAW AS COUNSEL

PLEASE TAKE NOTICE that, upon the annexed Declaration of Helen Davis Chaitman in Support of Application to Withdraw as Counsel, dated October 28, 2020 Chaitman LLP, attorney of record for Defendants KUNTZMAN FAMILY L.L.C.; JACQUELINE D. GREEN, in her capacity as a Managing Member of the Kuntzman Family L.L.C. and as Trustee of the Irrevocable Trust FBO Jennifer Gattegno and the Irrevocable Trust FBO Ethan Siegel, both members of the Kuntzman Family L.L.C.; and WAYNE D. GREEN, in his capacity as a Managing Member of the Kuntzman Family L.L.C., (the “Kuntzman Green Defendants”) in the above Adversary Proceeding, will present the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge at the United States Bankruptcy Court for the Southern District of New York at One Bowling Green, New York, NY 10004, for signature on November 18, 2020 at 12:00 PM.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed order, with proof of service, is filed with the Clerk of the Court and copies of such objection are served so as to be delivered to the undersigned, along with counsel to the Trustee, and a courtesy copy is delivered to the Bankruptcy Judge's chambers at least three days before the date of presentment, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and

objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: October 28, 2020
New York, New York

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
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